

Before The
Federal Communications Commission
Washington, D.C. 20554

RECEIVED

MM Docket No. 95-141

NOV 27 1995

In the Matter of

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
(Frederiksted, Virgin Islands)

RM-8642

To: Mr. John Karousos
Chief, Allocations Branch, Mass Media Bureau

DOCKET FILE COPY ORIGINAL

**REQUEST FOR WAIVER OF DEADLINES AND
FOR ACCEPTANCE OF LATE-FILED COMMENTS**

International Broadcasting Corporation ("IBC"), licensee of FM broadcast station WAHQ-FM, Carolina, Puerto Rico, by its attorneys, filed on November 13, 1995, before the unplanned shutdown of the Commission on November 14, 1995, short initial comments in opposition to the proposals of Jose Arzuaga in the above-captioned proceeding. Those comments were filed four business days after the reply date initially set for this proceeding. This was due to the late receipt by IBC of Arzuaga's counterproposal due to defective service by Arzuaga and the need thereafter to study the complicated issues raised by Arzuaga's pleadings. It is believed that no one has been prejudiced by such late filing and that the public interest will be served by acceptance of IBC's comments.

This pleading is designed to formally request a waiver of the comment and reply comments deadlines and that the Commission accept both the comments filed on November 13, 1995, and the comments and proposals contained in this filing. The October 23, 1995 counterproposal made by Arzuaga, which was not received by IBC until November 2, 1995, was

- 1 -

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the first notice IBC had of Arzuaga's proposal to have WAHQ's channel changed in order to allot a new channel to Culebra. IBC was also not aware of the conflict that Arzuaga's proposal creates for IBC's pending application to relocate its transmitter site to a location that enhances its coverage of the service area since it neither received a copy of the NPRM from the Commission nor from Arzuaga. The impact of the Commission's NPRM and of Arzuaga's counterproposal on IBC's station, however, is very severe and the Commission should not act on these proposals without having IBC's considered input. Thus, IBC respectfully requests that the Commission accept IBC's November 13 filing and this filing and that it deny both the proposals in the NPRM and in Arzuaga's counterproposals.

The acceptance of IBC's comments is in the public interest since it will assist the Commission in identifying serious procedural and administrative issues that preclude the grant of Arzuaga's proposals. The defects in Arzuaga's pleadings are two-fold. With respect to the October 23, 1995 counterproposal to allot a channel to Culebra, change the channel proposed by Arzuaga himself for allotment to Frederiksted, and to change WAHQ's present licensed channel, the proposed actions violate the Commission's report and order in Conflicts Between Applications and Petitions for Rulemaking to Amend the FM Table of Allotments, 7 FCC Rcd. 4917 (1992), *clarified*, 8 FCC Rcd. 4743 (1993) (the "*Reconsideration Order*"). Likewise, the original NPRM proposal should also be deemed cut-off by WAHQ's pending modification application and, in any event, fails to consider the benefits to result from WAHQ's modification.

A. Arzuaga's Counterproposal Is Defective As A Matter of Law

Arzuaga's counterproposal fails to take into account IBC's May 9, 1995 application to relocate its transmitter site to El Yunque (File No. BPH-950509ID). Arzuaga's proposed channel allotments for Culebra and Frederiksted cannot be made if IBC's proposed modification is considered. Arzuaga's technical study attached to the counterproposal shows, on its face, that IBC's pending application was not considered in the allocation study. The attached study by IBC's technical consultant establishes that Arzuaga's counterproposals cannot be effectuated if

IBC's modification is taken into account. This requires immediate dismissal of the counterproposal.

In the *Reconsideration Order*, the Commission clearly recognized that "under the new rule, a counterproposal filed before the counterproposal deadline in an FM allotment proceeding could be rendered unacceptable because a conflicting FM application was filed earlier. [W]e do not believe that this is inequitable" 8 FCC Rcd. at 4745. Since Arzuaga's October 23, 1995 counterproposal conflicts with IBC's earlier filed and cut-off May 9, 1995, application, it cannot be accepted.

B. The NPRM Proposal Has Become Moot, Is Procedurally Defective and Disserves the Public Interest

In the August 31, 1995 NPRM, the Commission states that the proposed allotment of Channel 298B1 to Frederiksted would preclude the grant of IBC's modification application. This is apparently based on the Commission's assumption that Arzuaga's request for rulemaking predates IBC's application, which is cut-off as of May 9, 1995. The first problem with this is that the undersigned has been unable to locate any document filed by Arzuaga prior to May 9, 1995, that is a petition for rulemaking for Channel 298B1, at Frederiksted. The only document that the undersigned has found is a 1993 counterproposal advanced by Arzuaga, as part of reply comments in RM 8026, a proceeding that had no effect on WAHQ and where IBC was not a party.

There, Arzuaga proposed the allotment of a Class A channel to Frederiksted. After facing strong opposition for that proposal, Arzuaga counterproposed in reply comments by proposing, in the alternative, that the Commission either (1) allot channel 298B1 to Frederiksted, or (2) allot a channel to Culebra and a different one to Frederiksted. The latter proposal would have necessitated a change of channel for WAHQ. In the *Report and Order* in RM 8026, 10 FCC Rcd. 8076 (1995), the Commission dismissed Arzuaga's proposals because Arzuaga failed to show the requisite interest in applying for the Class A channel it originally proposed. The

Commission noted, 10 FCC Rcd. at 8077, para. 4 and n. 6, that Arzuaga's counterproposal for channel 298B1 for Frederiksted was untimely filed and refused to consider it. It appears that it is that untimely filed counterproposal that the Commission is using as a basis for the above-captioned NPRM.

The Commission's actions appear erroneous on two grounds. First, Arzuaga's untimely counterproposal for channel 298B1 should not have been treated as a petition for rulemaking with cut-off protection dating back to 1993 when it was filed. The untimely counterproposal was just that -- a defective attempt by Arzuaga to change his own original petition for Frederiksted. The Commission gave no notice of the counterproposal and only parties to that proceeding had any notice of it since it was hidden in reply comments which were drafted in the alternative, and which was not the subject of further public comment. As of May 9, 1995, when IBC's application was cut-off, Arzuaga's counterproposal for channel 298B1 was not a viable "Petition" or request for rulemaking and could not have been entitled to any cut-off rights.

Therefore, IBC submits that, at best, Arzuaga's untimely counterproposal for channel 298B1 should have been treated as a new petition for rulemaking filed on July 25, 1995, the date of the *Report and Order* in RM-8026 which first made any public mention of the counterproposal. IBC's application was cut-off as of May 9, 1995, and, as a result, the NPRM proposal had to consider if the Arzuaga untimely counterproposal (turned into a petition for rulemaking) was precluded by IBC's application. The answer would have been a clear "yes" since IBC's application was cut-off more than two months prior to the *Report and Order* and more than three months prior to the NPRM.

Second, even allowing a July 25, 1995 cut-off date for Arzuaga's untimely counterproposal would have been procedurally suspect. The Commission's authority to turn an untimely counterproposal of which there is no public notice into a petition for rulemaking that is cut-off as of the date of the untimely filing is not evident. Moreover, the *Reconsideration Order* and the Commission's policies address conflicts between rulemaking "petitions" and FM

applications. Arzuaga never filed a rulemaking petition within the scope of Section 1.411 of the rules, and there is nothing in the NPRM suggesting that the Commission issued the NPRM on its own motion, the only other option under Section 1.411. All Arzuaga had on May 9, 1995 was an untimely counterproposal advanced in reply comments that the Commission itself acknowledged could not be considered for the purpose for which it was filed. How can a defective proposal, of which there was no public notice until much later, create such important cut-off rights as of 1993? The procedurally sound approach is for the Commission to request that Arzuaga file a new rulemaking petition for channel 298B1 or some other channel for Frederiksted taking into account the IBC May 9 relocation petition. The attached statement from IBC's technical consultant shows, in fact, that other channels can be allotted to Frederiksted without conflict with IBC's modification.

Finally, it is patently unfair to permit Arzuaga (or any other petitioner for that matter) to bootstrap early cut-off protection on a defective filing, in an unrelated proceeding that was terminated, of which there was no notice until after the IBC application was filed, and which was based on alternative counterproposals (a factor that by itself undermines the viability of the earlier untimely filing). This is all to say that the procedural circumstances surrounding the issuance of the NPRM are out of the ordinary and appear not to comport with what sound administrative process requires. There is no harm to Arzuaga if he is asked to file a bona fide petition for rulemaking for the Frederiksted channels that the attached engineering statement shows would not conflict with IBC's modification. The harm to IBC from the opposite result is great.

The NPRM proposal should also be denied because the benefits attendant to IBC's modification are far greater than the proposed provision of another channel to Frederiksted. The attached engineering statement shows the significant areas and population gains to be derived from IBC's relocation. The extension of a well-established and longstanding voice to such significant populations serves the public interest. The addition of a new voice to Frederiksted,

with a population of slightly over 1,000 persons, does not outweigh the public benefit attendant to IBC's modification. In addition, much of the coverage area of the Frederiksted station would fall over water, a factor that strongly suggests that a lower class station that does not conflict with IBC's proposal may be all that is warranted as a new voice for Frederiksted.

Finally, it should be noted that no expression of interest was filed for channel 298B1 at Frederiksted. The only comment of record is Arzuaga's own proposal to change the NPRM and it is with respect to the counterproposal that Arzuaga has stated an intention to apply. Thus, Arzuaga does not have of record any expressed intention to apply for the channel proposed in the NPRM and no one else appears to have such an interest. That renders the NPRM moot. It would be a disservice to the public interest to dismiss IBC's modification proposal and its increased coverage as a result of a proposal that no one seems to support.

In light of the foregoing, it is respectfully requested that the Commission reject as a matter of law Arzuaga's proposal to allot channels to Culebra and Frederiksted by changing the channel of WAHQ. Since Arzuaga no longer supports the proposal made in the August 31, 1995 NPRM, and since that proposal is procedurally suspect and not in the public interest, it should also be dismissed.

Respectfully submitted,

INTERNATIONAL BROADCASTING
CORPORATION

By: Nora E. Garrote

Nora E. Garrote
Piper & Marbury L.L.P.
1200 19th Street, N.W.
Washington, D.C. 20036
(202) 861-3900

Its Attorneys

November 27, 1995

CERTIFICATE OF SERVICE

Nora E. Garrote hereby certifies that on November 27, 1995, she has sent a copy of the above pleading to James L. Oyster, Esq., attorney for Arzuaga, at 108 Oyster lane, Castleton, Virginia 22716-9720, by Federal Express, next day delivery. A courtesy copy was hand delivered to Mr. John Karousos.

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Its Attorneys

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ORIGINAL

PETER V. GURECKIS & ASSOCIATES

RECEIVED

ENGINEERING STATEMENT

NOV 27 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

This Engineering Statement has been prepared on behalf of **Broadcasting Company**, licensee of Radio Station WAHQ (FM), Carolina, Puerto Rico. Station WAHQ is licensed to Channel 299 as a Class B station.

Station WAHQ now has on file a pending application to change transmitter site to a location on El Yunque Peak. At the new site Station WAHQ proposes a power of 12.0 KW ERP and a HAAT of 841 meters which is equivalent to the maximum facilities in Puerto Rico for a Class B station (50 KW and HAAT 472 meters), (BPH-9505091D).

In MM Docket No. 95-141, RM-8642, Jose J. Arzuaga (Arzuaga) proposed that Channel 298B1 be allotted to Frederiksted, Virgin Island. (No consideration is necessary to Arzuaga's counterproposal since the counterproposal does not provide protection to WAHQ's proposed application to change transmitter site. Thus, it does not comply with Section 73.207 of the Rules. Channel 298B1 as proposed by Arzuaga to Culebra is short spaced to WAHQ's proposed site by 4.97 kilometers. The required spacing is 71 kilometers and the actual spacing is only 66.23 kilometers)

The allotment of 298B1 to Frederiksted conflicts with the proposed application of Station WAHQ to change transmitter site. Attached as Figure 1 is a study of Channel 298B1 at the geographical coordinates for Frederiksted. It will be noted that the assignment of Channel 298B1 will be short spaced to Station WAHQ's proposed site by 28.06 kilometers and clears the licensed site of Station WAHQ by 0.71 kilometer.

Further, to provide full protection to WAHQ's proposed site requires that the tower site for Channel 298B1 at Frederiksted be located 28.06 kilometers east of Frederiksted. This places the site on the far eastern portion of St. Croix Island.

Thus, the allotment of Channel 298B1 to Frederiksted prevents Station WAHQ from increasing its facilities to a full Class B station on its licensed Channel 299.

PETER V. GURECKIS & ASSOCIATES

Station WAHQ now is licensed with a power of 50 KW and a HAAT of 27 meters. This is equivalent to a station having a power of only 4.612 KW and a HAAT of 100 meters. Thus, if the allotment of Channel 298B1 is assigned to Frederiksted, Station WAHQ will not be able to achieve a Class B status.

Attached as Figure 2 is the operating parameters for Station WAHQ's licensed and proposed operation.

Figure 3 is a map showing WAHQ's licensed and proposed 60 dbu (1 Mv/M) contours.

The 1990 U.S. populations and areas are as follows:

	<u>Population</u>	<u>Area (Sq. Km)</u>
WAHQ's Present 60 dbu	1,728,819	1,598
WAHQ's Proposed 60 dbu	2,161,947	4,579
Gain Area	433,128	2,981
% of Gain Area to Present Area	25.05%	34.89%

As it can be seen from Figure 3 the proposed 60 dbu contour serves all of the area served by WAHQ's present 60 dbu contour. Therefore, there is a substantial gain in population and area by Station WAHQ's proposed operation.

Whereas, the proposed assignment of Channel 298B1 to Frederiksted will serve only 50,139 persons (1990 U.S. Census) in an area of 214.7 square kilometers. The population and area to be served will only cover the Island of St. Croix and the rest of the coverage is in the Caribbean Sea.

In order to preserve Station WAHQ's proposed operation on Channel 299 this office conducted a search of other FM channels for Frederiksted. This study shows that Channel 222B1 can be assigned to the geographical coordinates specified in Arzuaga's counterproposal, namely N. Lat: 17° 44' 51",

PETER V. GURECKIS & ASSOCIATES

W. Long: 64° 50' 11". Figure 4 is a computer study of Channel 222B1. This study shows that Channel 222B1 complies with the minimum distance rules of the Commission using Arzuaga's site.

As a B1 station on Channel 222, a 70 dbu contour will serve almost the entire Island of St. Croix. Figure 5 is a map showing the 70 dbu contour over St. Croix Island. It will be noted that Frederiksted and Christiansted will receive a City Grade signal.

Further, a Class B station is not necessary on St. Croix Island since a Class B station will not serve any more population or area and it will just serve more of the Caribbean Sea.

At Arzuaga's proposed site, this office determined the actual HAAT by determining the terrain data for the eight standard radials using a 1/24,000 scale map. The terrain data and distance to the proposed Channel 222B1 contours are as follows:

<u>Bearing</u>	<u>3-16m Terrain</u>	<u>HAAT</u>	<u>Distance (Km)</u>	
			<u>70 dbu</u>	<u>60 dbu</u>
0°	over water	---	-----	-----
45°	41	305	28.5	46.55
90°	59	287	27.67	45.42
135°	20	326	29.48	47.89
180°	25	321	29.24	47.56
225°	46	300	28.27	46.24
270°	111	235	25.20	42.08
315°	over water	---	-----	-----
Center of Radiation Above Ground		=	56 meters	
Center of Radiation AMSL		=	346 meters	
Site AMSL		=	290 meters	
HAAT		=	296 meters	
ERP		=	25 KW	

PETER V. GURECKIS & ASSOCIATES

This office study also shows that Channel 222 and 269 can be allotted to Frederiksted as Class B channels at a site approximately 14.0 kilometers east of Frederiksted. Attached are Figures 6 and 7, the computer study for Channels 222B and 269B. Figure 8 is a map showing the tower site.

Assuming a HAAT of only 60 meters and 50 KW, the 60 dbu contour would extend to a distance of 21.51 kilometers, well, beyond Frederiksted. Also, from this site a City Grade signal would be placed over Christiansted.

Station WAHQ proposes the following FM Table of Allotments for the community of Frederiksted:

Plan A

	Channel No.	
	<u>Present</u>	<u>Proposed</u>
Frederiksted, Virgin Islands	253A, 278A	253A, 278A, 222B ^{/1}

Plan B

Frederiksted, Virgin Islands	253A, 278A	253A, 278A, 222B ^{/2}
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I, **PETER V. GURECKIS**, do hereby certify and declare under penalty of perjury that I am a consulting engineer with an office located at 10410 Windsor View Drive, Potomac, Maryland 20854-4024.

All of the above statements and computations made in this statement were made by myself or under my direct supervision and that all facts and information contained herein are true and correct to the best of my knowledge, except where stated to be on belief, and as to that information, I believe it to be true.

Date: November 20, 1995



Peter V. Gureckis

/1 Site restriction 6.5 kilometers northeast of Frederiksted.

/2 Site restriction 14 kilometers east of Frederiksted.

FIGURE 1

PETER V. GURECKIS BROADCAST CONSULTANT
10410 WINDSOR VIEW DR. POTOMAC MD 20854

frederiksted
vi

REFERENCE	CLASS B1	DISPLAY DATES
17 42 48 N		DATA 10-27-95
64 53 00 W	Current rules spacings	SEARCH 11-15-95
----- CHANNEL 298 -107.5 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
TYPE	LAT	LNG	PWR	HT	D-Mi	R-Mi	(KM)

AD298	298B1	Frederiksted	VI	0.0	0.00	175.0	-175.00 *
AD	17 42 48	64 53 00	0.000 kW	OM	0.0	108.8	
		Jose J. Arzuaga			RM8642	930119	
>PRM							

WAHQ.A	299B	Carolina	PR	304.4	116.94	145.0	-28.06 *
AP CM	18 18 36	65 47 41	12.000 kW	841M	72.7	90.1	
		International Broadcasting Co			BPH950509ID		

WAHQ	299B	Carolina	PR	301.6	145.71	145.0	0.71 <
LI CM	18 24 10	66 03 21	50.000 kW	27M	90.6	90.1	
		International Broadcasting Co			BLH780810AA		

FIGURE 2

STAFILE V:5.0 (C) 1987-94		10-27-95
I.D. # 102	C:\SEARCHFM\PRFM.FM	
0.) Call	WAHQ.A	11.) Expire date
1.) City	Carolina	12.) Service M
2.) State	PR	13.) Country U
3.) Ch. #	299,107.7 MHz	14.) Border
4.) Class	B	15.) Beam tilt N
5.) Lat.	18 18 36	16.) Pattern
6.) Lng.	65 47 41	17.) Polarization C
7.) Power	12.000	18.) Action 950518
8.) HAAT m	841	19.) File BPH950509ID
9.) Type	AP	20.) COR AMSL 1049
		21.) License Filed
10.) Licensee International Broadcasting Co		
Command... ?		

STAFILE V:5.0 (C) 1987-94		10-27-95
I.D. # 103	C:\SEARCHFM\PRFM.FM	
0.) Call	WAHQ	11.) Expire date
1.) City	Carolina	12.) Service M
2.) State	PR	13.) Country U
3.) Ch. #	299,107.7 MHz	14.) Border
4.) Class	B	15.) Beam tilt N
5.) Lat.	18 24 10	16.) Pattern
6.) Lng.	66 3 21	17.) Polarization C
7.) Power	50.000	18.) Action 940218
8.) HAAT m	27	19.) File BLH780810AA
9.) Type	LI	20.) COR AMSL 70
		21.) License Filed
10.) Licensee International Broadcasting Co		
Command... ?		

MANUAL CONSUMIDOR DE RADIO Y TELEVISION
and Selected Places
Área Estadística Consolidada Estándar, Áreas Estadísticas Metropolitanas Estándares,
Municipios, y Lugares Seleccionados

NUMBER OF INHABITANTS

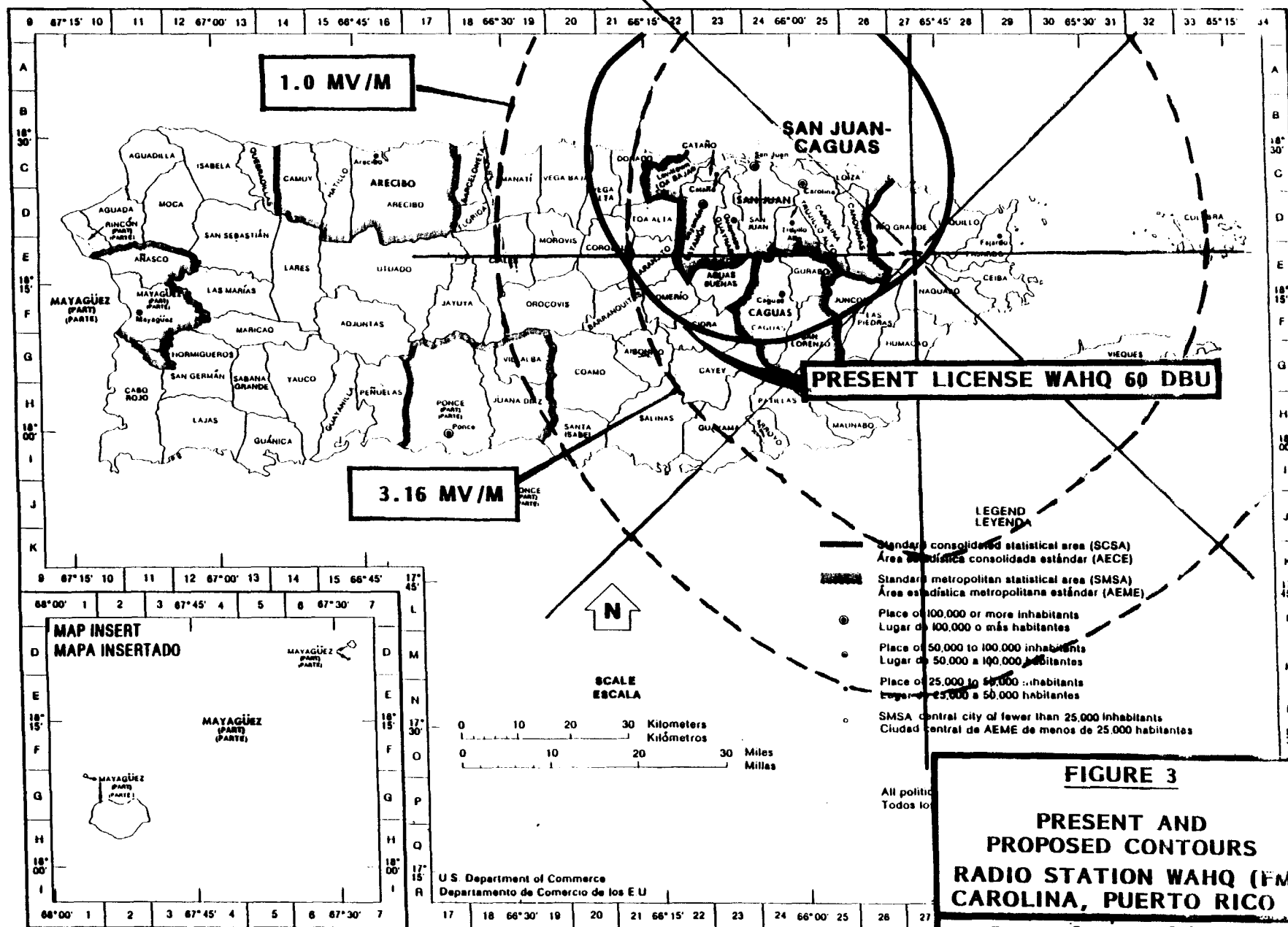


FIGURE 3

PRESENT AND PROPOSED CONTOURS
RADIO STATION WAHQ (FM)
CAROLINA, PUERTO RICO

Peter V. Gureckis & Assoc.
Consulting Radio Engineers
Potomac, MD

FIGURE 4

PETER V. GURECKIS BROADCAST CONSULTANT
10410 WINDSOR VIEW DR. POTOMAC MD 20854

frederisted
vi

REFERENCE	CLASS B1	DISPLAY DATES
17 44 51 N		DATA 10-27-95
64 50 11 W	Current rules spacings	SEARCH 11-16-95

----- CHANNEL 222 - 92.3 MHz -----

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
TYPE	LAT	LNG	PWR	HT	D-Mi	R-Mi	(KM)

WDCM.C	222B	Cruz Bay	VI	10.0	66.36	211.0	-144.64 *
CP CY	18 20 17	64 43 40	50.000 kW	397M	41.2	131.1	
		Paradise Broadcasting Corpora			BPH930106JI	950927	
>*To Channel 267B per D92-244							

WZOL	221A	Luquillo	PR	305.7	110.82	96.0	14.82
LI ZCN	18 19 54	65 41 11	4.600 kW	279M	68.9	59.7	
		Asociacion Puertorriquena del			BLH950531KA		

WORO	223B	Corozal	PR	289.4	168.04	145.0	23.04
LI CN	18 15 09	66 19 58	50.000 kW	365M	104.4	90.1	
		Catholic,Apostolic & Roman Ch			BLH900530KC		

FIGURE 5

REGULATION
PARK SERVICE

AREAS, AND U.S. FOREST SERVICE AREAS

The landing of aircraft is prohibited on lands or waters administered by the National Park Service, U.S. Fish and Wildlife Service without authorization from the respective agency. Exceptions include: 1) when forced to land beyond the control of the operator, 2) at officially designated landing sites, or 3) on approved official Government.

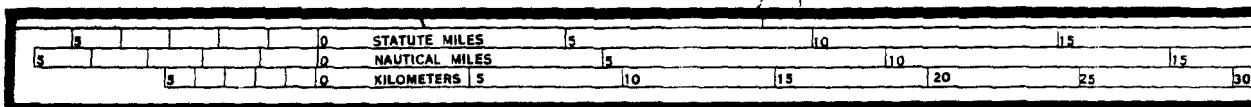
All aircraft are requested to maintain a minimum altitude of 1000 feet above the terrain of National Parks, Monuments, Reserves, Lakeshores, Recreation Areas and Scenic Riverways administered by the National Wildlife Refuge, Big Game Refuges, Game Ranges and Wildlife Ranges administered by the U.S. Fish and Wildlife Service and Primitive areas administered by the U.S. Forest Service.

Federal regulations also prohibit airdrops by parachute or other means of persons, cargo or objects from aircraft by the three agencies without authorization from the respective agency. Exceptions include: 1) emergency human life or 2) threat of serious property loss.

Boundary of National Park Service
U.S. Fish and Wildlife Service areas
U.S. Forest Service Wilderness and
areas.

PROPOSED CH. 222B1 - 60 DBU

04



2000 MSL

PROPOSED CH. 222B1 - 70 DBU

18°00'

VIRGIN ISLANDS

SAINT CROIX
(UNITED STATES)

PROPOSED ARZUAGA SITE

BUCK ISLAND REEF
NATIONAL MONUMENT

Frederiksted

ALEXANDER HAMILTON
CT - 118.8
64°17' 122.8
Airport of entry

ST. CROIX
108.2 CH 19 COY

SAN JUAN

See NOTAMS/Directory
for CZ eff hr

65°00'

13

12

200

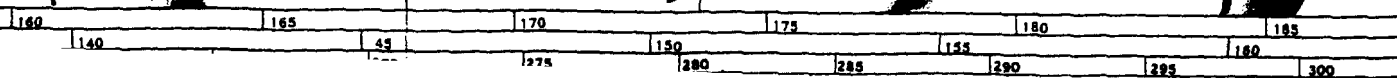


FIGURE 6

PETER V. GURECKIS BROADCAST CONSULTANT
10410 WINDSOR VIEW DR. POTOMAC MD 20854

registered
vi

REFERENCE	CLASS B	DISPLAY DATES
17 43 15 N		DATA 10-27-95
64 45 00 W	Current rules spacings	SEARCH 11-16-95
----- CHANNEL 222 - 92.3 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
TYPE	LAT	LNG	PWR	HT	D-Mi	R-Mi	(KM)

WDCM.C	222B	Cruz Bay	VI	2.0	68.35	241.0	-172.65 *
CP CY	18 20 17	64 43 40	50.000 kW	397M	42.5	149.8	
		Paradise Broadcasting Corpora			BPH930106JI	950927	
>*To Channel 267B per D92-244							
WZOL	221A	Luquillo	PR	304.3	120.01	113.0	7.01
LI ZCN	18 19 54	65 41 11	4.600 kW	279M	74.6	70.2	
		Asociacion Puertorriquena del			BLH950531KA		
WORO	223B	Corozal	PR	289.3	177.67	169.0	8.67
LI CN	18 15 09	66 19 58	50.000 kW	365M	110.4	105.0	
		Catholic, Apostolic & Roman Ch			BLH900530KC		
WYQE	225A	Naguabo	PR	302.4	115.48	69.0	46.48
LI ZCN	18 16 50	65 40 13	3.900 kW	229M	71.8	42.9	
		Efrain Archilla-Diez			BLH950106KB		

FIGURE 7

PETER V. GURECKIS BROADCAST CONSULTANT
10410 VANDERBILT AVE. L.R. POPOWIC MD 20364

FREDERISTED VI

REFERENCE	CLASS B	DISPLAY DATES
17 43 15 N		DATA 10-27-95
64 45 00 W	Current rules spacings	SEARCH 11-15-95
----- CHANNEL 269 -101.7 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
TYPE	LAT	LNG	PWR	HT	D-Mi	R-Mi	(KM)

ALOPEN	267B	Cruz Bay	VI	341.5	74.41	74.0	0.41 <
AL N	18 21 31	64 58 21	0.000 kW	OM	46.3	46.0	
92-244							

>Effective 9-11-95-Reserved for WDCM per D92-244

WTBN	271B	Charlotte Amalie	VI	341.6	74.44	74.0	0.44 <
LI CN	18 21 33	64 58 18	33.000 kW	509M	46.3	46.0	
Trans Caribbean Broadcasting				BLH890831KE			

WZAR	270B	Ponce	PR	284.1	197.07	169.0	28.07
LI CN	18 09 15	66 33 15	14.000 kW	789M	122.5	105.0	
Ponce Broadcasting Corp.				BLH7893			